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COMPANY, and UNITED GENERAL  
TITLE INSURANCE COMPANY  
(acting on behalf of the Defendants  
listed below for purposes of this stipulation)

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Attorneys for Plaintiff Lisa Blackwell

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

LISA BLACKWELL, on Behalf of  
herself and All Others Similarly  
Situating,

Plaintiff,

vs.

FIDELITY NATIONAL  
FINANCIAL, INC., *et al.*,

Defendants.

CASE NO. CV 08-01928 MEJ

Assigned Judge: Hon. Maria-Elena James

**STIPULATION AND [PROPOSED]  
ORDER RE TIME TO RESPOND TO  
COMPLAINT**

1 WHEREAS, on April 11, 2008, Plaintiff filed a Complaint seeking recovery under  
2 the Sherman Act, Cal. Bus. and Prof. Code §§ 16720, *et seq.*, Cal. Bus. and Prof. Code  
3 §§ 17200, *et seq.*, and alleging unjust enrichment;

4 WHEREAS, on April 11, 2008, this Court issued an Order setting forth various  
5 deadlines regarding initial case management conference and ADR deadlines (the "Initial  
6 Scheduling Order"); and

7 WHEREAS, not all of the Defendants have yet retained local counsel admitted in  
8 the Northern District of California, but have authorized counsel for Defendant First  
9 American Corporation to file this Stipulation;

10 WHEREAS, this action is one of sixty-four (64) actions recently filed in district  
11 courts across the country that are the subject of a pending Motion for Transfer of Actions  
12 Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings filed  
13 with the Judicial Panel on Multidistrict Litigation ("J.P.M.L.") in *In re Title Insurance*  
14 *RESPA and Antitrust Litigation* (the "MDL Motion"), and that motion is scheduled for  
15 argument before the J.P.M.L. on May 29, 2008; and

16 WHEREAS, Defendants believe that judicial economy and efficiency will be  
17 promoted by extending the existing deadlines in this case pending a determination of the  
18 MDL Motion, and therefore, have requested an extension of time of 45 days after the  
19 ruling by the J.P.M.L. on the MDL Motion within which to move against, answer or  
20 otherwise respond to the Complaint, and have requested to adjourn the deadlines set forth  
21 in the Court's Initial Scheduling Order; and

22 WHEREAS, Plaintiff's counsel has agreed to these requests;

23 NOW THEREFORE, the undersigned parties through their respective counsel  
24 stipulate and respectfully request on behalf of all Defendants that the Court order as  
25 follows:

26 1. The attorneys for the following Defendants hereby accept service of the  
27 Complaint on behalf of those Defendants.  
28

1 Greenberg Traurig, LLP: The First American Corporation, First American Title  
2 Insurance Company, and United General Title Insurance Company.

3 Simpson Thacher & Bartlett, LLP: Fidelity National Title Insurance Company,  
4 Fidelity National Financial, Inc., Chicago Title Insurance Company, Ticor Title  
5 Insurance Company, Ticor Title Insurance Company of Florida, and Security Union Title  
6 Insurance Company.

7 Fulbright & Jaworski, LLP and Sidley Austin, LLP: Stewart Title Guaranty  
8 Company and Stewart Title Insurance Company.

9 Severson & Werson and Sutherland Asbill & Brennan, LLP: Landamerica  
10 Financial Group, Inc., Commonwealth Land Title Insurance Company, Lawyers Title  
11 Insurance Corporation, and Transnation Title Insurance Company.

12 Dewey & Leboeuf, LLP: National Title Insurance of New York, Inc.

13 2. The time for all Defendants listed in Paragraph 1 above to move against,  
14 answer or otherwise respond to the Complaint shall be extended until 45 days following  
15 the determination of the pending MDL Motion by the J.P.M.L.

16 3. The June 26, 2008 deadline set forth in this Court's Initial Scheduling Order  
17 for the Rule 26(f) conference and ADR process selection, shall be extended until 30 days  
18 following the determination by the J.P.M.L. of the pending MDL Motion, with  
19 corresponding extensions of the additional deadlines set forth in the Initial Scheduling  
20 Order.

21 Defendants reserve their rights to move for a stay of all proceedings in this action  
22 until the J.P.M.L. determines the pending MDL Motion, or to request further extensions  
23 of this deadline, and Plaintiff reserves her rights to oppose such motion or request.

24 Nothing in this stipulation shall be construed as a waiver of any party's right to  
25 seek or oppose transfer of this action or coordination or consolidation of this action with  
26 any other action.

1 This stipulation may be executed in counterparts, including by signature  
2 transmitted by facsimile.

3  
4 Dated: May 22, 2008

Respectfully Submitted,

GREENBERG TRAURIG, LLP

5  
6 By

  
FRANK E. MERIDETH, JR.

7 Attorneys for Defendants THE FIRST  
8 AMERICAN CORPORATION, FIRST  
9 AMERICAN TITLE INSURANCE COMPANY,  
10 and UNITED GENERAL TITLE INSURANCE  
11 COMPANY (acting on behalf of the Defendants  
12 listed below for purposes of this stipulation)

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10 and STEWART TITLE INSURANCE  
11 COMPANY

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23 INSURANCE CORPORATION, and  
24 TRANSNATION TITLE INSURANCE  
25 COMPANY

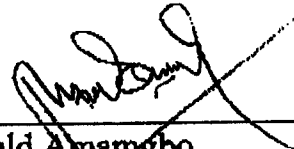
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15 Attorneys for Defendant NATIONAL TITLE  
16 INSURANCE OF NEW YORK, INC

17 Dated: May 22<sup>nd</sup>, 2008

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Attorneys for Plaintiff Lisa Blackwell

1  
2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

3  
4 DATED: \_\_\_\_\_  
5 HON. MARIA-ELENA JAMES  
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